

Honorable Julius Genachowski, Chairman  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: CG Docket No. 10-51

Dear Chairman Genachowski and Commissioners McDowell, Clyburn, Rosenworcel, and Pai,

I am a non-certified interpreter, however I have 31 years experience interpreting for my brother between family members and 10 years working as a teacher for the deaf and hard-of-hearing. I have recently, in the past 10 years, had the honor of serving the deaf and hard-of-hearing communities and hearing communities by facilitating communication. The advent of Video Relay Service (VRS) has revolutionized the lives of the clients it serves, removing barriers, building relationships, and improving the efficiency and accuracy of communication between deaf and hearing individuals. Four years ago, I became an employee of a VRS provider, working as a Video Relay Interpreter. This is the most rewarding, challenging, and exciting job I have ever had. As an employee of a Video Relay Service provider, I have seen first-hand that this life-altering broadband service is a vital link that connects deaf people to the hearing community.

I was deeply disturbed to see the recent proposal that all VRS interpreters must hold national certification from the Registry of Interpreters for the Deaf, Inc. (RID). This proposal, if adopted by the Commission, would have devastating and far-reaching effects on the VRS industry, the employees who work within it, and the customers it serves. I would respectfully request that you consider the following:

1. The Americans with Disabilities Act (ADA) requires effective communication, and one of the auxiliary aids and services listed as a method for ensuring effective communication is a qualified interpreter, not a certified interpreter. According to a document posted on the ADA website, "Certification is not required if the individual has the necessary skills. To be qualified, an interpreter must be able to convey communications effectively, accurately, and impartially, and use any necessary specialized vocabulary." The ADA recognizes that an interpreter can be qualified without being certified. When I do my job as a Video Relay Interpreter, I am effective as evidenced by the callers meeting their communication goals for each call I interpret.

2. The proposal as submitted by the Registry of Interpreters for the Deaf, Inc. (RID) is to require that every VRS interpreter hold RID certification, which in and of itself seems self-serving. It is important to note that several states have their own certification testing systems that have been deemed valid and reliable by psychometricians, and to exclude those testing systems without first conducting an analysis of comparability to the RID testing system would be a disservice to the interpreters who hold those certifications and the consumers of those interpreters. I currently have a state certification level of a QA 3 which is the highest level. I chose the state test because of the ease of administration and the reduced cost to take the test. In these harsh economic times, I am working as a teacher AND an interpreter, so every dollar I make is budgeted leaving no money left for expensive tests.

3. RID wants you, the Federal Communications Commission (FCC), to choose their screening. However, under the current testing system, the backlog for receiving test results is often in excess of six months. Requiring RID certification for employees of VRS providers would increase the backlog as eligible non-certified candidates overwhelm the system, further delaying results, and leaving our callers without access to vital services while interpreters were being deemed ?eligible? to work.

4. There are many interpreters working for VRS providers who are either not certified by RID or hold certification from a different entity. Yet, those VRS providers have a base of consumers who return to their provider of choice time and time again, despite interpreter certification or lack thereof.

Ultimately, the deaf consumers are the real gauge of an interpreter?s efficacy, regardless of certification level.

5. Many ?retired? interpreters have let their certification lapse, but choose to work for VRS providers a few hours a week or a few days a month. This new ruling, if implemented, would force ?retired? interpreters to have to retest in order to maintain a part-time job that many of them hold for no other reason than love of the deaf community and appreciation for the accessibility afforded by VRS.

6. There are many working interpreters who are not eligible to sit for certification with RID. Consider the following:

a. Some VRS interpreters are native Spanish speakers and cannot successfully pass the English/ASL test that RID offers. There is no equivalent test for Spanish/ASL and RID currently has no plans to develop an instrument that will adequately assess interpreters with this unique skill set. Therefore, any Spanish Video Interpreter (SVI ? Spanish/ASL interpreter), who currently works for a VRS provider but doesn?t hold RID certification is left with no alternative testing system. The loss of non-certified Spanish/ASL VRS interpreters will negatively impact the accessibility to VRS of deaf individuals who rely on Spanish/ASL interpreters for their communication needs. At the very least, their accessibility will be limited to communication with English-speaking consumers. Ensuring that ALL deaf individuals have access to VRS, regardless of the language pair they utilize, should be a high priority for you as Chairman and Commissioners of FCC.

b. Many VRS interpreters who?ve learned ASL by interactions with the Deaf community, whether native sign language users or not, may not meet the educational requirements necessary to qualify for a certifying exam with RID.

Finally, I would ask you to consider the impact on the provision of VRS as we currently know it if this proposal is adopted. VRS providers would be left with no choice but to terminate the employment of interpreters who are currently non-certified. Despite RID's argument that there are currently over 9,500 certified interpreters among the RID membership, not all of them are qualified to work in the VRS setting, and not all of those who are qualified choose to work in the VRS setting. The number of interpreters who provide service to consumers of VRS will most surely decrease. Yet, the number of consumers of that service will remain the same. As a result, the current wait time for consumers will increase as will the workload of the certified interpreters who remain, while the ability of VRS providers to meet speed of answer requirements will be jeopardized. The domino effect would significantly alter the provision of this life-changing, vital service for deaf and hard-of-hearing individuals, and it might even be the beginning of the end of VRS.

As a non-certified interpreter, I have been studying over the past 3 years to take the national test. I have attended workshops to prepare for the test. I have not taken the test due to monetary constraints and recent debates about the new format of the test. Nevertheless, I recognize that RID certification cannot be the only answer. It is only one of the many methods in place to help validate that an individual has the skill to interpret in the VRS setting. Some VRS providers have developed their own screening systems and several state certification systems are also valid and reliable means of assessing the skill level of an interpreter. RID cannot be declared the "be all and end all."

With a solid career teaching the deaf and hard-of-hearing with many accolades behind my name, I am confident that I would continue employment and supplement my income by tutoring should VRS be forced into extinction by a lack of certified interpreters to staff VRS call centers. However, I believe it is important to emphasize to you that I choose to work in the video relay service industry. Day after day, I see lives profoundly impacted in positive ways by the service our industry provides, whether the interpreter who handles the call is certified by RID or not. I am honored to play a vital role in the communication access of deaf and hard of hearing individuals, and I am humbled by the trust they place in me every time they choose to use VRS. I appeal to you to carefully consider the impact of this proposal if adopted, both on the interpreters who have chosen to work in this industry and on the consumers who benefit from its service on a daily basis.

Respectfully submitted,

Dawn Zamot, QA 3  
Margate, FL